

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

)

Case No. 1:25-MJ-*209*(DJS)**JACINTO-CRUZ, Victor Manuel**

)

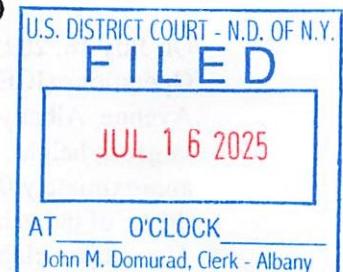
)

)

)

Defendant.

)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of July 16, 2025, in the county of Albany in the Northern District of New York the defendant violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

Victor Manuel JACINTO-CRUZ, an alien, native and citizen of Mexico, being an alien who has been denied admission, excluded, deported, or removed, or has departed the United States while an order of exclusion, deportation, or removal is outstanding, entered and was thereafter found in the United States without the Attorney General of the United States, or his successor, the Secretary of Homeland Security, having expressly consented to his reapplication for admission to the United States.

This criminal complaint is based on these facts:

- Continued on the attached sheet.

Complainant's signature

Patrick Dell'Anno, U.S. Homeland Security Investigations

Printed name and title

Attested to by the Affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date:

Judge's signature

City and State:

Albany, New York

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title

I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI) assigned to the Albany, New York HSI field office. I have been so employed since August 2020. In this role, I have participated in a number of investigations involving violations of the Immigration and Nationality Act.

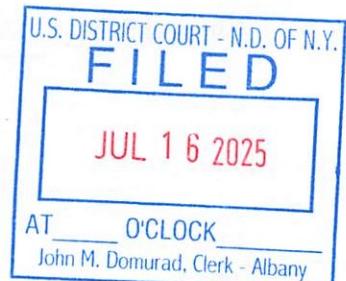
On July 16, 2025, Immigration Customs and Enforcement - Enforcement and Removal Operations (ICE-ERO) Albany, NY conducted an approved field operation at 518 Washington Avenue, Albany, NY. At approximately 06:00 hours, officers observed a subject resembling the target in height, weight, and facial features exiting the residence and entering a yellow van. At approximately 06:35 hours, ICE officers initiated a vehicle stop on I-90 near Albany, NY. The driver of the vehicle was questioned and admitted to being illegally present in the United States. The subject claimed to have crossed illegally through Yuma, AZ in the summer of 2017. The subject was transported to the Albany sub office for further processing. The subject provided identification noting he is Victor Manuel JACINTO-CRUZ, a citizen and national of Mexico.

ICE ERO obtained additional information from the subject, including fingerprints and biographical information, which were entered into Department of Homeland Security databases. The subject's fingerprints resulted in a positive match for a previously removed alien, Victor Manuel JACINTO-CRUZ, under file number A# 208194770.

According to these records, JACINTO-CRUZ is a citizen of Mexico and has been removed from the United States pursuant to immigration proceedings. On September 10, 2015, United States Border Patrol determined JACINTO-CRUZ entered the United States unlawfully near Nogales, AZ from Mexico at a time and place other than as designated by immigration officers of the United States of America. JACINTO-CRUZ was issued an Expedited Removal order and removed to Mexico on September 13, 2015 via the Del Rio, TX International Bridge. JACINTO-CRUZ also has a prior voluntary return near Sasabe, AZ on or about November 17, 2006.

JACINTO-CRUZ has not obtained the express consent of the Attorney General of the United States or her successor, the Secretary of Homeland Security, to reapply for admission to the United States.

Based on the foregoing, there is probable cause to believe that on July 16, 2025, while in Albany County, the defendant violated 8 U.S.C. §1326(a), which prohibits aliens who have been denied admission, excluded, deported; or removed, or has departed the United States while an order of exclusion, deportation, or removal is outstanding, from entering and being found in the United States unless the Attorney General of the United States, or her successor, the Secretary of Homeland Security, has expressly consented to their reapplication for admission to the United States.

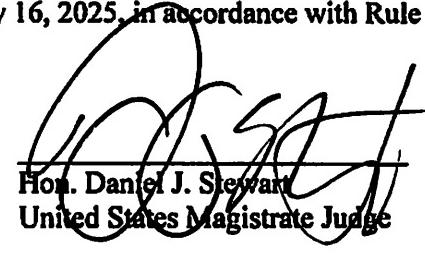


Attested to by the affiant



Patrick Dell'Anno
Special Agent
Homeland Security Investigations

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on July 16, 2025, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Daniel J. Stewart
United States Magistrate Judge